

November 4 1996

Office of the Secretary
Federal Communication Commission
1919 M Street NW
Room 8850
Washington D.C. 20554

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Sirs:

Please find inclosed an original and four copies of our **Reply Comments** for:

Strasburg Co. MM Docket No. 96-175 Room 8850

Thank you



Vern Egli
JPI Radio inc
12104 old Hwy 169
Hibbing Mn. 55746
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Before the
Federal Communication Commision

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In the matter of

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Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations

MM Docket No 96-175
RM-8850

(Strasburg CO.)

Directed to: Chief, Allocations Branch

REPLY COMMENTS

On behalf of JPI Radio, we hereby submit these reply comments for consideration for the MM Docket No 96-175 (Strasburg Co.).

I would like to address a number of the comments that Magic City Media stated in their comments about the Strasburg Amendment.

1. The statement that there is already a commercial station licensed to Strasburg and because the town is small it should not receive another allocation.

It is true that there is a commercial station licensed to Strasburg, and it has been there for a number of years (for more than 6 years) but it is not constructed, and there are no other commercial stations within 50 km. Also there are no NCE stations within 90 km of Strasburg.

2. The Strausberg station would put city grade coverage (60db) over a number of small towns that would not be able to have a station of their own.

3. Magic City also proposed that you change the allocation to channel 280 (103.9) and furnished an allocation study that shows that 280 would work. (figure 1)

continued

The channel 280 would work but please note that the distance from the town had to be moved almost 20 km from the center of town and the interfering signals that are at the 2nd adjacent channels and are a full class C and C1, and are from that same direction as the town from the tower sight . This means that Straburg and the small towns of Bennett and Watkins would not benefit from channel 280 as much as on channel 249. (figure 2)

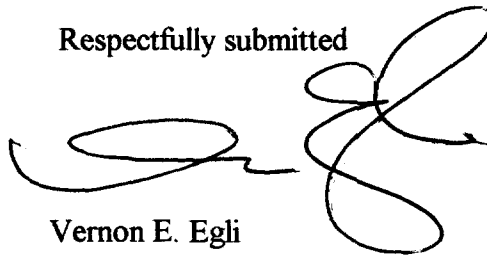
4. Magic Media also stated that they would like to move to 249 and raise to a full class C.

The benefit to the town of Cheyenne Wy. for increase of Magic Media to a class C station is questionable. At the present time there are two C1 stations (one being Magic Media), One C3, two A's and three class D's. Also there are two more pending class D stations in the application stages. With this many stations just in the city of license not including the surrounding area, would the 11.4 mile of city grade (60db) coverage be worth the sacrifice of a number of "small communities" as Magic Media has proposed.

Also I would like to note that in the 16 years that Magic Media has been licensed, they have not built the station to the C1 limits (100,000 watts at 300m(984 ft.)) but are at 100,000 watts at 165m(541 ft.), almost 450ft under the class allowable. If they could not do that in 16 years, when will they be able to build the extra 435m(1427ft) of tower needed?

5. I certify that I have prepared this preparation of these Reply comments, and that the facts contained are true to the best of my knowledge, information and belief, and are accurate and true.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'Vernon E. Egli', with a large, stylized flourish extending from the end of the signature.

Vernon E. Egli
Board member
JPI Radio, INC
12104 Old Hwy 169
Hibbing Mn. 55746

Reply Comments : MM Docket No. 96-175, RM-8850

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Certificate of Service

I, Vernon E. Egli, board member of JPI Radio Inc., certify that a copy of the foregoing Reply Comments, MM Docket No. 96-175, RM-8850, has been sent by U.S. Mail, First Class paid, this Nov. 4 1996 to the people that made comments.

Magic City Media Inc
1912 Capitol Avenue
Suite 300
Cheyenne Wy. 82001

Class C3 search chan 249 (97.7 Mhz) around 39-45-31 N 104-09-04 W

Call	Chan		City,St	Dist	Deg	Req	Margin	Prot	Int	FS	HAAT	Pw
NEW	249C3	A	Strasburg,CO	0.02	311	153.00	-153.0	38.79	24.50	40	114	20.00
KBCOF	247C	L	Boulder,CO	99.17	280	96.00	3.2	83.20	2.10	80	470	88.00
KIGN	250C1	L	Cheyenne,WY	165.70	334	144.00	21.7	59.55	10.30	54	1651	100.00
KKFM	251C	L	Colorado Spr,CO	128.36	209	96.00	32.4	91.41	2.10	80	698	71.00

q

Figure 2

MAPFM search of channel 280C3 (103.9 MHz), at N. 39 46 9, W. 104 6 50.

Searching Channel 280C3 (103.9 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
KTCL	Fort Collins	CO	227	C	L	76.5	31.0	298.4°	45.5
ALC	Denver	CO	278	C	U	96.2	96.0	267.4°	0.2
KRFX	Denver	CO	278	C	L	96.2	96.0	267.4°	0.2
ALC	Canon City	CO	280	A	U	174.2	138.0	213.4°	36.2
KSTY	Canon City	CO	280	A	L	174.2	138.0	213.4°	36.2
ALC	Gering	NE	280	C3	U	231.9	153.0	9.5°	78.9
ALC	Burlington	CO	281	C1	U	167.8	144.0	108.3°	23.8
KNABFM	Burlington	CO	281	C1	L	167.8	144.0	108.3°	23.8
ALC	Longmont	CO	282	C1	U	98.4	76.0	298.4°	22.4
KQKS	Longmont	CO	282	C2	L	98.4	56.0	298.4°	42.4
KQKS	Longmont	CO	282	C1	C	76.5	76.0	298.4°	0.5
KQKS	Longmont	CO	282	C1	C	102.1	76.0	279.0°	26.1
NEW	Longmont	CO	282	C1	A	102.1	76.0	279.0°	26.1
NEW	Longmont	CO	282	C1	A	102.1	76.0	279.0°	26.1
NEW	Longmont	CO	282	C1	A	102.1	76.0	279.0°	26.1

FIGURE 1
CHANNEL STUDY
CHANNEL 280 C3
STRASBURG, COLORADO
MAGIC CITY MEDIA, INC.
SITE 19.2 KM EAST OF STRASBURG